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**By ECF**

May 1, 2019

Hon. Vernon Broderick  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

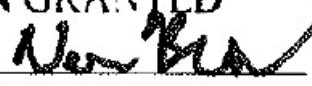
Re: *Great Western Ins. Co. v. Mark Graham et. al.* (No. 18-cv-6249 (VSB))  
Request for Further Extension of Time to Answer or Move

Your Honor:

I represent Defendant Gregory Tolaram. With apologies to Your Honor, I write again to request the Court's approval for a further extension of time for Mr. Tolaram to answer or move against the Second Amended Complaint. The original deadline was March 15, 2019. On April 1<sup>st</sup>, this Court granted an extension until May 1<sup>st</sup> (Doc. No. 150), considering the parties being actively engaged in settlement discussions to resolve this matter on mutually agreeable terms (as explained in my letter of March 29, 2019 [Doc. No. 149]). At the time of my March 29th letter, we did not expect that more time would be required to determine if the parties are able to reach a settlement, but due to conflicting demands on time and various unexpected deadlines, settlement negotiations are still ongoing. Thus, I respectfully request a further two-week extension of time for Mr. Tolaram to answer or move. Gerard Kelly, lead counsel for Great Western, has agreed to and consents to this extension of time.

Respectfully submitted,

/s/ Andy S. Oh  
Andy S. Oh

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 5/2/2019

Defendant Tolaram's deadline to respond to the complaint is extended until May 17, 2019.